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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Joseph J. Smith, *on behalf of  
himself and all others similarly  
situated,*

Plaintiff,

v.

One Nevada Credit Union,

Defendant.

Case No.: 2:16-cv-02156-GMN-NJK

**DECLARATION OF JOSEPH J. SMITH  
IN SUPPORT OF MOTION FOR  
ATTORNEYS' FEES, COSTS, AND  
INCENTIVE AWARD**

**JUDGE: HON. GLORIA M. NAVARRO**

**DECLARATION OF JOSEPH J. SMITH**

I, Joseph J. Smith, declare:

1. I am the plaintiff in this case. I have personal knowledge of the following facts and, if called upon as a witness, could and would competently testify to the matters herein.
2. I am submitting this declaration in support of the Motion for Attorneys' Fees, Costs, and Incentive Award in this case.
3. I have been serving as the Class Representative in this matter since the settlement was preliminarily approved on September 16, 2018. I understand my tasks as a class representative and have participated throughout this litigation in the belief that I was helping all other people similarly situated.
4. I have agreed to the class settlement with Defendant with the assistance of my attorneys and after two private mediations before a retired judge.
5. In this case, I have participated in calls regarding fact-finding efforts with my attorneys, preparing with my attorneys and appearing for my deposition that was taken on July 17, 2017 in Las Vegas, assisted with discovery issues relating to my account, made myself available telephonically for the mediation sessions on May 19, 2017 and August 25, 2017, submitted a declaration in support of preliminary approval, and now submit this declaration in support of the petition for an award of attorneys' fees, costs of litigation, and a service award.
6. I support my attorneys Kazerouni Law Group, APC's and Haines & Krieger's request to be award attorneys' fees of \$171,490.33 and costs of litigation up to \$8,509.67 from the settlement fund.
7. I also believe that my efforts in this case merit a service award of \$5,000 from the settlement fund, which I believe is reasonable to compensate me for my time spent bringing and working on this case, participating in discovery, going to and appearing for my deposition and staying informed about the settlement process.
8. I feel strongly about protecting my rights and the rights of others involving credit history and credit information.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed on  
2 December 21, 2018, pursuant to the laws of the United States and the State of Nevada.

3 By:   
4 Joseph J. Smith  
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